

U.S. BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

IN RE: Jessica Danielle Phipps

Chapter 13
Case No. 23-61125

Debtor(s)

MOTION TO EXTEND AUTOMATIC STAY

The Debtor(s), by counsel, state as follows:

1. That on 10/13/2023, the Debtor(s) filed in this Court a Petition under Chapter 13 of the US Bankruptcy Code.
2. The Debtor's previous bankruptcy cases are as follows:
#18-61996, filed on 10/11/2018, Chapter 13, and dismissed 9/21/2023.
3. Due to the dismissal of the previous case, the automatic stay will expire 30 days after the date of filing this new petition.
4. The Debtors are requesting that the Court extend the automatic stay for the following reason(s): Debtor voluntarily dismissed her prior case because she had incurred substantial medical debts since the date of filing of her prior case. Therefore, she dismissed her prior case and filed a new case so she can include these new medical debts.

WHEREFORE, the Debtor(s) prays that the Court, after notice and an opportunity for hearing, enter an Order extending the automatic stay until such time the Court deems otherwise.

Dated: 10/13/2023

Respectfully submitted,

JESSICA DANIELLE PHIPPS

By Counsel

/s/ Marshall M. Slayton
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913 East Jefferson Street

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Counsel for Debtor(s)

NOTICE OF HEARING

On application of the Debtors in the above-entitled case, notice is hereby given of the hearing on Debtors' Motion to Extend Automatic Stay, which is scheduled to be held on 10/26/2023, at 9:30AM, via Zoom before Judge Connelly. The parties shall not appear in person. The Meeting ID for the hearing is 160 369 2643, and may be accessed by using the following link: <https://vawbuscourts-gov.zoomgov.com/j/1603692643>. For more instructions on how to access the hearing, please visit the Court's website at www.vawb.uscourts.gov.

/s/ Marshall M. Slayton
Marshall M. Slayton

10/13/2023
Date

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to the Bankruptcy Trustee via ECF, and was submitted to CertificateOfService.com for servicing via first-class mail to all creditors and to the Debtor(s), on 10/13/2023.

Certification from CertificateOfService.com will follow.

/s/ Marshall M. Slayton
Marshall M. Slayton